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LETTER AND U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL
QUALITY COMMENTS ON DRAFT ACTION MEMORANDUM FOR SOLID WASTE
MANAGEMENT UNIT 7B (SWMU7B) SMALL BOATS SANDBLAST YARD JEB LITTLE CREEK
VA
1/16/2013
CH2MHILL



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January 16, 2013

Virginia Department of Environmental Quality
Attn: Mr. Paul Herman, P.E.
629 Main Street, 4th Floor
Richmond, VA 23219

Subject: Response to VDEQ Comments on the
*Draft Action Memorandum for Solid Waste Management Unit 7b -Small Boats
Sandblast Yard*
Joint Expeditionary Base Little Creek, Virginia Beach, Virginia
Navy CLEAN 1000, Contract N62470-08-D-1000, Task Order WE32

Dear Mr. Herman:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments from VDEQ received on January 15, 2013 on the *Draft Action Memorandum for Solid Waste Management Unit 7b - Small Boats Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia* (CH2M HILL, December 2012):

Comment 1: Declaration Page: In the 2nd sentence of the opening paragraph please correct "Time".

Response: The requested revision has been made.

Comment 2: Section II.A: The 2nd paragraph identifies 22 outfalls while Section A.1 - 3rd paragraph and A.3 identify 21 outfalls. Please correct.

Response: Section A.1 - 3rd paragraph and Section A.3 has been revised to identify 22 outfalls.

Comment 3: Section III: In the last paragraph please note there are no human health risks to receptors exposed to sediment and there are no ecological risks to receptors exposed to surface water.

Response: The paragraph was revised to read: "Based on the data and results of the SI, RI, and Post-MILCON Action Evaluation, it was determined that metals (copper, lead, mercury, and zinc) are present in sediment at concentrations that pose potentially unacceptable ecological risks to lower-trophic-level receptors (benthic macro invertebrates). No potentially unacceptable human health risk from exposure to sediment was identified. Because of the tidal nature of the water body and 22 outfalls surrounding the cove, any contamination detected in the surface water of the cove may or may not be associated with SWMU 7; therefore, surface water was not evaluated in the HHRA and ERA.

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Comment 4: Section V.A.2: In the 1st sentence please insert the phrase “removal action area” following “SWMU 7b”.

Response: In addition to changes per USEPA comments, the requested revision has been made.

The above response (and other Team comments/responses) will be incorporated into the final version of the SWMU 7b Action Memorandum.

Please do not hesitate to contact me at 757-671-6280 if you have any questions concerning these responses.

Sincerely,

Nathaniel A Price

Digitally signed by Nathaniel A Price
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Nathaniel Price, P.E.
Project Manager

cc: Mr. Bryan Peed/NAVFAC Mid-Atlantic
Mr. Jeffrey Boylan/USEPA
Ms. Cecilia Landin/CH2M HILL
Administrative Record File